

REMARKS

In an Office Action mailed on October 22, 2003, an objection was made to the drawings; claims 1-8 were rejected under 35 U.S.C. § 112, second paragraph; claims 1-8, 13-17 and 18 were rejected under 35 U.S.C. § 102(e) as being anticipated by Aronstam; claims 18-21 and 23 were rejected under 35 U.S.C. § 102(e) as being anticipated by Barrett; claims 10-12 were allowed; and claims 22 and 24 were objected to as being dependent upon a rejected base claim but were indicated as being allowable if rewritten in independent form. Newly added claims 25-29 depend from allowed claim 10. Therefore, allowance of claims 25-29 is requested. Original claims 22 and 24 has been rewritten in independent form as independent claims 30 and 34, respectively. Therefore, allowance of claims 30-39 is requested. New claims 40-43 as well as the §§ 102 and 112 rejections are discussed below.

§ 112 Rejections and Objection to Drawings:

The Examiner rejects claims 1-8 under 35 U.S.C. § 112, second paragraph as being indefinite because the feature "within the well" is allegedly not shown in the drawings. The Examiner makes a corresponding objection to the drawings for the same reason. For purposes of expediting prosecution, claim 1 has been amended to recite that the carousel of tools is sealed *to* the well (emphasis added). As the drawings clearly show a carousel of tools that are sealed to the well, withdrawal of the objection to the drawings and withdrawal of the § 112 rejections are requested.

Rejections of Claims 1-8:

Claim 1 stands rejected under 35 U.S.C. § 102(e) as being anticipated by Aronstam. In particular, the Examiner refers to the language in lines 38-40 in column 7 of Aronstam to allegedly teach the carousel of claim 1. The cited language refers to "a chamber or magazine." However, neither a chamber nor a magazine discloses a carousel or a carousel of tools, as set forth in claim 1. Thus, for at least the reason that Aronstam fails to teach all limitations of independent claim 1, withdrawal of the § 102 rejection of claim 1 is requested.

Claims 2-8 are patentable for at least the reason that these claims depend from an allowable claim.

Rejections of Claims 13-16:

The method of independent claim 13 has been amended to incorporate the limitations of claim 17. As amended, the method of claim 13 includes halting flow of fluid to allow sensors to descend into a well.

Amended claim 13 overcomes the § 102 rejection for at least the reason that Aronstam fails to teach or even suggest halting flow of a fluid to allow sensors to descend into a well. Furthermore, the Examiner fails to specifically address claim 17 (whose limitations now appear in claim 13), as the Examiner fails to specifically show where this limitation is allegedly taught by Aronstam. Therefore, for at least the reason that Aronstam fails to teach halting flow of a fluid to allow sensors to descend into a well, withdrawal of the § 102 rejection of claim 13 is requested.

Claims 14-16 are patentable for at least the reason that these claims depend from an allowable claim.

Rejections of Claims 18-21 and 23:

As amended, the system of claim 18 includes a well and a robot that is permanently sealed in the well to selectively perform an intervention. Contrary to the limitations of amended claim 18, Barrett teaches a wireline-based unit from which a robot may descend into a well and then return to the wireline unit. However, Barrett neither teaches nor suggests that its robot is permanently sealed in the well. Therefore, for at least this reason, withdrawal of the § 102 rejection of claim 18 in view of Barrett is requested.

The Examiner also rejects independent claim 18 under 35 U.S.C. § 102(e) in view of Aronstam. In particular, the Examiner refers to the sensor 63 as a "robot." However, as pointed in the last reply, a robot is "a mechanical device for performing a task which might otherwise be done by a human." Thus, the Examiner is not assigning a reasonable construction to "robot," but rather, the Examiner is arbitrarily applying this term to any device, such as the sensor 63, in attempt to derive the § 102 rejection. However, when the term "robot" is assigned a reasonable construction, claim 18 overcomes the § 102 rejection in view of Aronstam.

Claims 19-21 and 23 are patentable for at least the reason that these claims depend from an allowable claim.

Claims 40-43:

Original claim 16 has been rewritten in independent form as claim 40. Therefore, in the discussion of claim 40 below, the § 102 rejection of claim 16 is addressed. Claim 40 recites introducing sensors into a chemical injection port of a well.

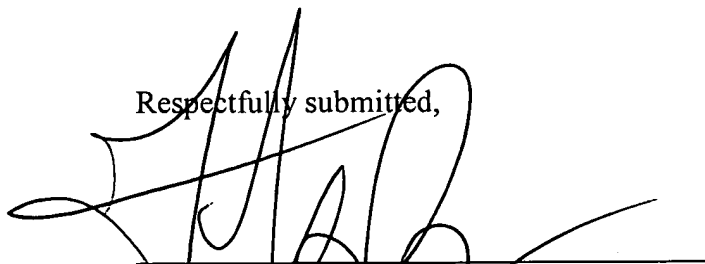
Contrary to the limitations of claim 40, the Examiner refers to element 62 of Aronstam to allegedly show the introduction of sensors into a chemical injection port. However, contrary to the Examiner's position, Aronstam teaches that element 62 is a supply unit that is located at one or more locations to introduce devices 63 into the flow of drilling fluid. However, a port to communicate with a drilling fluid flow does not constitute a chemical injection port of a well. Therefore, for at least the reason that Aronstam fails to teach or even suggest the limitations of independent claim 40, allowance of claim 40 is requested.

Claims 41-43 are patentable for at least the reason that these claims depend from an allowable claim.

CONCLUSION

In view of the foregoing, withdrawal of the §§ 112 and 102 rejections and a favorable action in the form of a Notice of Allowance are requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (22.1410).

Respectfully submitted,



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